

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

PLAZA HOME MORTGAGE, INC.

PLAINTIFF

v.

CIVIL ACTION NO. 2:21-CV-00038-HSO-JCG

**INNOVATED HOLDINGS, INC.
Dba SITCOMM ARBITRATION
ASSOCIATION, et al**

DEFENDANTS

RESPONSE IN OPPOSITION TO MOTION FOR SUMMARY JUDGMENT

Plaza Home Mortgage, Inc. (“Plaza”) files this Response in Opposition to Eeon Jones’ (“Jones”) Motion for Summary Judgment (“Response”). In support, Plaza relies on the arguments and authorities set forth in its accompanying Memorandum.

Plaza respectfully requests that this Court deny Jones’ Motion for Summary Judgment and additionally requests such other and further relief as the Court deems just and appropriate under the circumstances.

Dated: May 14, 2021.

Respectfully submitted,

PLAZA HOME MORTGAGE, INC.

By: /s/ R. Lane Bobo

One of its Attorneys

OF COUNSEL:

Sheldon G. Alston, MSB #9784
R. Lane Bobo, MSB #105263
BRUNINI, GRANTHAM, GROWER & HEWES, PLLC
190 East Capitol Street, Suite 100 (39201)
Post Office Box 119
Jackson, MS 39205-0119
Telephone: (601) 948-3101

Facsimile: (601) 960-6902

salston@brunini.com

lbobo@brunini.com

CERTIFICATE OF SERVICE

I, R. Lane Bobo, hereby certify that I have this day electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record. Additionally, I hereby certify that I have this day served via certified mail a true and correct copy of the above on the following:

Kirk Gibbs
4155 Lawrenceville Hwy
PMB 8119
Lilburn, GA 30047

Brett Eeon Jones
304 S. Jones Blvd., Ste. Eeon 1967
Las Vegas, NV 89107

Dated: May 14, 2021.

/s/ R. Lane Bobo
R. LANE BOBO